

REMARKS

In view of the foregoing amendments, reconsideration of the present application is respectfully requested. Claims 1 and 23 have been amended. New claims 34-35 have been added. Support for the amendments to the claims can be found at at least page 14, lines 2-14; page 20, line 7 to page 30, line 20; and page 31, line 20 to page 44, line 22 of the application as originally filed. Claims 1-35 are currently pending.

Claims 1-33 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,330,976 to Dymetman et al. ("Dymetman"). The Office Action asserts that column 8, line 45 to column 9, line 5; column 10, lines 1-67; column 14, lines 5-45, column 23, line 46 to column 24, line 12; and Figures 1, 4, and 8 of Dymetman teach the features of independent claims 1 and 23 as previously presented. In the Response to Arguments on page 4 of the Office Action, it is asserted that column 14, lines 16-24 & 39-45 and column 23, line 46 to column 24, line 12 of Dymetman teach "a unique position (i.e., unencoded binary data of an active region) on an address pattern (i.e., a page 2) that can be identified (machine-readable marking encoding) from an examination of a portion of the address pattern (2)." It is further asserted that Dymetman teaches that "the active area on the formatted surface with the unique unencoded binary data is formatted such that a position on the address pattern can be identified and encoded by an electronic reading device." The Office Action indicates that it is believed that the limitations of claims 1-33 are still met by Dymetman and that the rejection is maintained.

Dymetman describes a system in which a user may manipulate a detection device to capture images of portions of a hardcopy document, derive an action/medium identifier from a captured image, and provide the action/medium identifier to a network to produce an action through the network. Independent claim 1 has been amended to include the feature of "wherein the electronic reading device further includes a memory adapted to store a grid description, the grid description associating an action to be performed by the electronic reading device with the specific part of the address pattern." Applicant respectfully submits that Dymetman fails to teach or suggest at least this feature of independent claim 1. Although Figure 8 of Dymetman appears to illustrate a special purpose pointer having a memory, Applicant respectfully submits that there is no teaching or suggestion in Dymetman of an electronic reading device that includes a memory adapted to store a grid description that associates an action to be performed by the

electronic reading device with a specific part of an address pattern. Applicant respectfully submits that independent claim 1 as amended distinguishes over Dymetman and requests that the 35 U.S.C. 102(e) rejection of independent claim 1 be withdrawn.

Independent claim 23 has been amended to include the feature of "storing, by the electronic reading device, a grid description, the grid description associating an action to be performed by the electronic reading device with the detected portion of the address pattern." For similar reasons as those discussed with respect to independent claim 1, Applicant respectfully submits that Dymetman fails to teach or suggest at least this feature of independent claim 23.

Applicant respectfully submits that independent claim 23 as amended distinguishes over Dymetman and requests that the 35 U.S.C. 102(e) rejection of independent claim 23 be withdrawn.

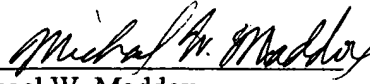
Claims 2-22 and 24-33 are dependent upon and include the features of independent claims 1 and 23, respectively. For at least the reasons as discussed with respect to independent claims 1 and 23, Applicant respectfully submits that claims 2-22 and 24-33 distinguish over Dymetman and requests that the 35 U.S.C. 102(e) rejection of claims 2-22 and 24-33 be withdrawn.

New claims 34 and 35 are dependent upon and include the features of independent claims 1 and 23, respectively. For at least the reasons as discussed with respect to independent claims 1 and 23, Applicant respectfully submits that claims 34-35 distinguish over Dymetman. Additionally, Applicant respectfully submits that Dymetman fails to teach or suggest the feature of claim 34 of "a client adapted to receive a grid description request from the electronic reading device, and provide the grid description to the electronic reading device in response to the grid description request." Applicant further respectfully submits that Dymetman fails to teach or suggest the features of claim 35 of "sending, by the electronic reading device, a grid description request to a client" and "providing, by the client, the grid description in response to the grid description request." Applicant respectfully submits that new claims 34-35 distinguish over Dymetman.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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